

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE: FIELDWOOD ENERGY, LLC, <i>ET</i>	§	
AL.	§	CHAPTER 11
	§	
DEBTORS <sup>1</sup>	§	CASE NO. 20-33948 (MI)
	§	
	§	

**THE STATE OF LOUISIANA’S OBJECTION TO NOTICE TO CONTRACT PARTIES  
TO EXECUTORY CONTRACTS AND UNEXPIRED LEASES OF THE SCHEDULE OF  
ASSUMED CONTRACTS AND CURE AMOUNTS**

MAY IT PLEASE THE COURT:

The State of Louisiana, Department of Natural Resources and the State Mineral and Energy Board (“State”), by and through its undersigned counsel, hereby files this objection to the Chapter 11 Debtor’s *Notice to Contract Parties to Executory Contracts and Unexpired Leases of the Schedule of Assumed Contracts and Cure Amounts [Docket No. 1395]* (the “Cure Notice”), and (B) the *Amended Schedule of Assumed Contracts [Docket No. 1456]* (“Amended Schedule”). In support of its Objection, the State respectfully represents as follows:

**PRELIMINARY STATEMENT**

On May 27, 2021, Debtors filed the Cure Notice at Docket number 1935. On June 2, 2021, the Debtors filed the Amended Schedule. Both documents show that the Debtors hold an interest in State Leases or Operating Agreements to which the State is a counterparty. Specifically, the

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<sup>1</sup> 1 The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

documents show that the Debtors have an interest in Unit Operating Agreements associated with State Leases 17860, 17861, and 19718. Further, the Debtors have listed the cure amounts for those interests at zero dollars (\$0.00).

**OBJECTION**

Based on the foregoing, the State hereby objects to the assignment of these interests with a zero dollar cure amount. The correct cure amount associated with those State Leases is outlined on the attached exhibit, which details the discrepancies between the actual amounts owed by the debtors and the amount paid by the debtors. These discrepancies result in the net cure amount of \$68,651.38.

The State therefore objects to the assumption and/or assignment of any leases or agreements to which the State is a counterparty without the satisfaction of the actual cure amount totaling \$68,651.38.

Dated: June 8, 2021  
Baton Rouge, Louisiana

JEFF LANDRY  
ATTORNEY GENERAL  
STATE OF LOUISIANA

By:  \_\_\_\_\_

RYAN M. SEIDEMANN, PH.D. (La. Bar No. 28991)

CHRISTOPHER J. LENTO (La. Bar No. 35614)

Assistant Attorney General

Louisiana Department of Justice

P. O. Box 94005

Baton Rouge, Louisiana 70804-9005

Telephone: (225) 326-6000

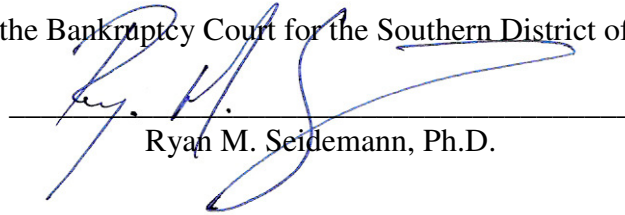
Facsimile: (225) 326-6099

seidemannr@ag.louisiana.gov

LentoC@ag.Louisiana.gov

CERTIFICATE OF SERVICE

This is to certify that, on June 8, 2021, a copy of the foregoing was served by the Electronic Case Filing System for the Bankruptcy Court for the Southern District of Texas.



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Ryan M. Seidemann, Ph.D.